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for the Northern Mariana Islands
By [Signature]
(Deputy Clerk)

Attorneys for the United States of America

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN MARIANA ISLANDS**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

**DONGLIN XU a/k/a "Tony,"
QINGJIANG LI, and RUI WANG,**

Defendants.

Criminal Case No. **CR 23-00025**

INDICTMENT

Count One:

Conspiracy to Transport Illegal Aliens
8 U.S.C. § 1324(a)(1)(A)(ii) and (v)(I)

Forfeiture Allegation

18 U.S.C. § 982(a)(6), 8 U.S.C. § 1324(b)(1)
and 28 U.S.C. § 2461(c)

THE GRAND JURY CHARGES THAT:

The Scheme

During the period relevant to this Indictment, Defendant DONGLIN XU was a citizen of the People's Republic of China who had no lawful right or authority to enter the Territory of Guam. During the period relevant to this Indictment, Defendants QINGJIANG LI and RUI WANG were citizens of the People's Republic of China who were residing without lawful status or authority in the District of the Northern Mariana Islands. Beginning in or about June 2023, Defendant DONGLIN XU initiated a plan to transport and move himself from the District of the

1 Northern Mariana Islands with the intent to unlawfully enter and reside in the Territory of Guam.
2 At some point between in or about June 2023 and September 13, 2023, Defendant QINGJIANG
3 LI joined Defendant DONGLIN XU in the plan to transport and move themselves from the
4 District of the Northern Mariana Islands to the Territory of Guam, knowing and in reckless
5 disregard of the fact that neither had the right or authority to enter Guam.

6 As part of the plan, Defendants QINGJIANG LI and DONGLIN XU recruited, conspired,
7 and agreed with twelve other citizens of the People's Republic of China, including Defendant
8 RUI WANG, who Defendants QINGJIANG LI and DONGLIN XU knew and recklessly
9 disregarded that they were residing without lawful status in the District of the Northern Mariana
10 Islands and the United States. Defendants QINGJIANG LI and DONGLIN XU charged up to
11 five thousand dollars (\$5,000) per person and arranged a boat to transport and move themselves
12 and the twelve other aliens, including Defendant RUI WANG, from the island of Saipan, in the
13 District of the Northern Mariana Islands, to the Territory of Guam on or about September 13,
14 2023. The plan and intent of Defendants QINGJIANG LI and DONGLIN XU, as well as the
15 other twelve aliens, including Defendant RUI WANG, was to enter the Territory of Guam at a
16 location other than a designated point of entry, to evade contact with immigration authorities, to
17 avoid detection by law enforcement, and to reside in the Territory of Guam without lawful status.
18 In furtherance of the scheme, Defendants QINGJIANG LI and DONGLIN XU performed overt
19 acts, including but not limited to accepting payments from the other twelve aliens and stepping
20 on board the boat that was to transport and move all fourteen aliens to Guam on September 13,
21 2023. In furtherance of the scheme, Defendant RUI WANG, performed overt acts, including but
22 not limited to making payments to QINGJIANG LI and DONGLIN XU, and stepping on board
23 the boat that was to transport and move all fourteen aliens to Guam.

Count One: Conspiracy to Transport Illegal Aliens

8 U.S.C. § 1324(a)(1)(A)(ii) and (v)(I)

On or about September 13, 2023, in the District of the Northern Mariana Islands, Defendants DONGLIN XU, a/k/a “Tony”, and QINGJIANG LI combined, conspired, confederated, and agreed with each other, and with Defendant RUI WANG, as well as others known and unknown to the Grand Jury, to commit an offense defined in Title 8 United States Code § 1324(a)(1)(A)(v)(I), specifically, conspiracy to transport illegal aliens in violation of Title 8 United States Code § 1324(a)(1)(A)(ii), to wit, by agreeing to transport and move themselves and, in the case of Defendants DONGLIN XU and QINGJIANG LI, twelve other aliens, including Defendant RUI WANG, as well as:

1. Qin Chen;
2. Qingjun Chen;
3. Hongmei Din;
4. Ziyong Xu;
5. Huiping Shangguan;
6. Xiping Gao;
7. Yuxing Lin;
8. Lu Xu;
9. Xiangke Zhang;
10. Bin Weng; and
11. Fuquan Miao.

knowing and in reckless disregard that said aliens were in the United States in violation of law and in furtherance of such violation of law, all in violation of Title 8, United States Code, § 1324(a)(1)(A)(ii) and (v)(I).

Forfeiture Allegation

The allegations contained in the sole count of this Information are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 982(a)(6), Title 8, United States Code, Section 1324(b)(1), and Title 28, United States Code, Section 2461(c).

2. Upon conviction of the conspiracy to transport illegal aliens offense in violation of Title 8, United States Code, Section 1324(a)(1)(A)(ii) and (v)(I), set forth in sole count of this Indictment, Defendants, DONGLIN XU, a/k/a "Tony," QINGJIANG LI, and RUI WANG shall forfeit to the United States of America:

a. pursuant to Title 18, United States Code, Section 982(a)(6)(A), any conveyance, including any vessel, vehicle, or aircraft used in the commission of the offense of which the Defendants are convicted; and any property real or personal -- that constitutes, or is derived from or is traceable to proceeds obtained directly or indirectly from the commission of the offense of which the Defendants are convicted; or that is used to facilitate, or is intended to be used to facilitate, the commission of the offense of which the Defendants are convicted;

b. pursuant to Title 8, United States Code, Section 1324(b)(1), any conveyance, including any vessel, vehicle, or aircraft, that has been or is being used in the commission of a violation of Section 1324(a), the gross proceeds of such violation, and any property traceable to such conveyance or proceeds; and

c. the property to be forfeited includes, but is not limited to, the following: money judgment.

3. If any of the property described above, as a result of any act or omission of the Defendants:

- a. cannot be located upon the exercise of due diligence
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b) and Title 28, United States Code, Section 2461(c).

All pursuant to Title 18, United States Code, Sections 982(a)(6), Title 8, United States Code, Section 1324(b)(1), and Title 28, United States Code, Section 2461(c).

Dated this 26th day of September, 2023.

A TRUE BILL.

Signature of foreperson has been
REDACTED pursuant to the Privacy Policy of the
Judicial Conference of the United States.

SHAWN N. ANDERSON
United States Attorney

By:


ERIC S. O'MALLEY
Assistant United States Attorney